Dear Contributor,

Thank you for participating in the public consultation of the ICNIRP draft guidelines.

Please note that it is important that ICNIRP understands exactly the points that you are making. To facilitate our task and avoid misunderstandings, please:

* be concise
* be precise
* provide supporting evidence (reference to publication, etc.) if available and helpful.

**How to complete the comments table:**

Please use 1 row per comment. If required, please add extra rows to the table.

This response document asks you to provide your ‘comment’, your ‘proposed change’, and the ‘context’ to this comment and proposed change. What is meant by these is the following:

**Comment :** A brief statement describing the issue that you have identified (and that you would like ICNIRP to take into account in the final version of the guidelines).

**Proposed Change:** A brief statement describing how you would like the document changed to account for this issue.

**Context:** A brief statement identifying relevant documents in support of your comment and proposed change.

**Please, provide your details below as per the online form and the provision of the privacy policy**

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| --- | --- | --- |
| Last name, first name: BELPOGGI, Fiorella | Email address: Your email address. | Affiliation (if relevant): Ramazzini Institute, Bologna Italy |
| If you are providing these comments officially **on behalf** of an organization/company, please name this here: Ramazzini Institute | | |
| I hereby agree that, for the purpose of transparency, **my identity (last and first names, affiliation and organization where relevant) will be displayed** on the ICNIRP website after the consultation phase along with my comments.  I want my comments to be displayed anonymously. | | |

|  | **Document**  **(Guidelines, App A,**  **App B)** | **Line Number**  **#** | **Type of comment (General/ Technical/ Editorial)** | **Comment. Proposed change. Context.** |
| --- | --- | --- | --- | --- |
| **1** | Guidelines | Line number | General | Insert your comment.  For sure both NTP and RI studies were well performed, no bias affecting the results. ICNIRP confirms that.  ICNIRP note 2018: Methodological considerations |
| **2** | Document ? | Line number | General | Insert your comment.  Shwannomas are tumors arising from the Schwann cells, they are peripheral glial cells which cover and protect the surface of all nerves diffused throughout the body; so vestibular (acoustic nerve) observed in epidemiological studies and heart schwannomas in the experimental animals have the same tissue of origin: ICNIRP seems to ignore that;  ICNIRP note 2018: Biological interpretations of the studies’ data |
| **3** | Document ? | Line number | General | Insert your comment.  In rats, increases in malignant heart schwannomas, malignant glial tumors of the brain and Schwann Cells Hyperplasia (a pre-malignant lesion) are rare yet these lesions were observed in exposed animals of both laboratories, at thousands of kilometers distance, in a wide range of RFR exposures studied. These findings could not be interpreted as occurring “by chance”.  ICNIRP note 2018: Biological interpretations of the studies’ data |
| **4** | Document ? | Line number | General | Insert your comment.  The Authors of Falcioni et al. 2018 are scientists, their role is to produce solid evidence for hazard and risk assessment. Underestimating the evidence from carcinogen bioassays and delays in regulation have already proven many times to have severe consequences, as in the case of asbestos, smoking and vinyl chloride. This position of ICNIRP represents its own responsibility toward citizens and public health.  ICNIRP note 2018:Conclusions |
| **5** | Document ? | Line number | General | Insert your comment.  ICNIRP is not a public health agency that routinely evaluates carcinogens. On the other hand, an independent agency that has evaluated over 1000 agents, IARC, as early as 2011 classified RFR as a possible carcinogen on the basis of limited evidence in humans and less than sufficient evidence in animals. The studies of the RI and NTP will certainly contribute to the burden of evidence that IARC and other public health agencies can draw upon as a solid base for the re-evaluation of RFR carcinogenicity.  ICNIRP note 2018:Conclusions |
| **6** | Document ? | Line number | Type of comment | Insert your comment.  Insert your proposed change.  Explain the context of your comment. |
| Continue numbering | Document ? | Line number | Type of comment | Insert your comment.  Insert your proposed change.  Explain the context of your comment. |

Add further rows if needed. For this copy the above row.

And paste it here.